

# EXHIBIT J

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
BUS. LIT. SESSION NO. 1

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BRANDA PEEBLES and JOSHUA BERGER,  
Individually and on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

JRK PROPERTY HOLDINGS, INC., STEVENS  
POND APARTMENTS PROPERTY OWNER,  
LLC, and ONE WEBSTER APARTMENTS  
PROPERTY OWNER, LLC,

Defendants.

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Civil Action No. 1984-cv-03714

**DEFENDANTS' STIPULATION REGARDING LEASES**

Defendants JRK Property Holdings, Inc., Stevens Pond Apartments Property Owner, LLC, and One Webster Apartments Property Owner, LLC, by their undersigned counsel, without waiving any defenses or objections, including without limitation as to relevancy, hereby stipulate and agree as follows:

1. The exemplar Apartment Lease Contracts and accompanying addenda provided for 2016 through 2021 for the Residences at Stevens Pond are representative of the leases and accompanying addenda of other tenants at the Residences at Stevens Pond, 1 Founders Way, Saugus, Massachusetts, for each of those years, with respect to the provisions pertaining to move-out and the tenant(s)' security deposit.
2. The exemplar Apartment Lease Contracts and accompanying addenda provided for 2016 through 2021 for One Webster Apartment Homes are representative of the leases and

accompanying addenda of other tenants at One Webster Apartment Homes, 1 Webster Avenue, Chelsea, Massachusetts, for each of those years, with respect to the provisions pertaining to move-out and the tenant(s)' security deposit.

3. The properties in Massachusetts owned or operated by JRK had the following turnover rates during the relevant years:

<b>Property</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>4 Year Avg.</b>
One Webster Apartment Homes	76%	66%	71%	71%	71%
Residences at Stevens Pond	57%	60%	65%	59%	60%

Agreed:

JRK PROPERTY HOLDINGS, INC.,  
STEVENS POND APARTMENTS  
PROPERTY OWNER, LLC, and ONE  
WEBSTER APARTMENTS PROPERTY  
OWNER, LLC,

By their attorneys,

/s/ Thomas H. Wintner  
Thomas H. Wintner (BBO # 667329)  
Mathilda S. McGee-Tubb (BBO # 687434)  
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Dated: June 17, 2021